

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

SEI INSIEME LLC,

Case No. 22-11670 (JPM)
Chapter 11

Debtor.

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STIPULATION REGARDING SCHEDULING OF HEARINGS

SEI INSIEME LLC, the debtor (the “**Debtor**”), and 307-309 Sixth Avenue LLC (“**307-309 LLC**”) (jointly referred to as the “**Parties**”), hereby stipulate and agree as follows:

WHEREAS, on December 14, 2022, the Court held a hearing on the Debtor’s motion for a temporary restraining order (“TRO”); and

WHEREAS, the Court granted the TRO through December 27, 2022; and

WHEREAS, the Parties have agreed to extend the date of the TRO through January 25, 2023, in order to provide sufficient time to brief the relevant issues; and

WHEREAS, the parties have also agreed to a briefing schedule as set forth below;

NOW THEREFORE, IT IS HEREBY STIPULATED, CONSENTED AND ORDERED:

1. The TRO shall be extended to January 25, 2023.
2. The briefing schedule shall be as follows:
 - a. 307-309 LLC shall have until January 9, 2023, to file its opposition, if any, to the Debtor’s motion for a restraining order and to file a motion to lift the automatic stay. For purposes of clarity to the extent 307-309 LLC does not file a motion to lift the stay at this time it is not barred from filing a motion request stay relief at a later date.
 - b. Debtor shall have until January 16, 2023, to file opposition to the lift stay motion and reply to 307-309 LLC’s opposition (if any).

- c. 307-309 LLC shall have until January 20, 2022, at 2:00 p.m. to reply to opposition to the lift stay (if any).
- d. The hearing on all matters referenced herein to be held on January 25, 2023, at 10:00 a.m.

3. The Court may extend these deadlines on agreement of the parties or of its own volition.

4. This Stipulation may be executed in one or more counterparts, including by facsimile and/or electronic mail, each of which shall be deemed an original, but all of which together constitute one and the same instrument.

Dated: December 27, 2022
Harrison, New York

For the Debtor:

BRONSON LAW OFFICES, P.C.

By: /s/ H. Bruce Bronson
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Dated December 27, 2022
Cedarhurst, New York

For 307-309 LLC:

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By: /s/ Aviva Francis
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SO ORDERED.

/s/John P. Mastando III
Honorable John. P. Mastando III
United States Bankruptcy Judge